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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE CENTRAL EUROPEAN
DISTRIBUTION CORPORATION
SECURITIES LITIGATION

The Document Relates To:

ALL ACTIONS.

HON. JEROME B. SIMANDLE

CIVIL ACTION NO:
1:11-CV-06247-JBS-KMW

MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT,
CERTIFICATION OF
SETTLEMENT CLASS AND
APPROVAL OF NOTICE

In support of the proposed Settlement in the above-captioned action (the “Action”), Lead Plaintiffs, on behalf of themselves and all others similarly situated, respectfully move this Court to:

1. Preliminarily approve the proposed settlement (“Settlement”) reflected in the Stipulation of Settlement dated May 12, 2014 (the “Stipulation” or the “Settlement Agreement”), attached hereto as Exhibit 1;¹

2. Preliminarily certify the class described in the Stipulation for purposes of the Settlement;

3. Approve the Notice of Pendency of Class Action and Proposed Settlement (“Notice”) attached as Exhibit A-1 to the Stipulation and the summary notice attached as Exhibit A-3 to the Stipulation (“Summary Notice”), which have been agreed to by the parties, and find that the mailing and distribution of the Notice and publishing of the Summary Notice substantially in the manner set forth in the proposed Preliminary Approval Order meet the requirements of Fed. R. Civ. P. 23 and due process and are the best notice practicable under the circumstances and shall constitute due and sufficient notice to all persons entitled thereto;

4. Direct that the Notice and Summary Notice be disseminated in the manner described in the proposed Order Granting Preliminary Approval

¹ All capitalized terms that are not otherwise defined herein shall have the same meanings as set forth in the Stipulation.

of Class Action Settlement, Approving Form and Manner of Notice, and Setting Date for Hearing on Final Approval of Settlement (“Preliminary Approval Order”);

5. Establish a date for a hearing on final approval of the proposed Settlement and on Plaintiffs’ Counsel’s request for attorneys’ fees and reimbursement of expenses. In this respect, the enclosed Proposed Preliminary Approval Order requires the Court to insert a date at Paragraph 2 for the purpose of conducting a hearing to consider final approval of the Settlement, the proposed Plan of Distribution as defined in the Notice, and the application for attorneys’ fees and reimbursement of expenses (“Final Approval Hearing”); and

6. Enter an order substantially in the form of the Proposed Preliminary Approval Order preliminarily approving the Settlement and the Notice, preliminarily certifying a Settlement Class, and setting a date for the Final Approval Hearing.

Dated: May 12, 2014

BARRACK, RODOS & BACINE

By: /s/ Mark R. Rosen
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